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2122-CC00361 - MARY MACAULAY V ST LOUIS BOA PLACE LLC ET AL (E-CASE)

Case FV File View	Parties & Vessels	Docket Entries	Charges, Judgments & Sentences	Service Information	Filings Due	Scheduled Hearings & Trials	Civil Judgments	Garnishments/ Execution
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Document ID - 21-SMCC-1792; Served To - ST. LOUIS BOA PLACE, LLC; Server - R SABOURIN, SERVICE DEPUTY; Served Date - 12-APR-21; Served Time - 13:25:00; Service Type - Sheriff Department; Reason Description - Served

04/07/2021 [Corporation Served](#)

Document ID - 21-SMCC-1793; Served To - JONES LANG LASALLE AMERICAS INC; Server - ; Served Date - 26-MAR-21; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served

03/17/2021 [Alias Summons Issued](#)

Document ID: 21-SMCC-1793, for JONES LANG LASALLE AMERICAS INC.

 [Alias Summons Issued](#)

Document ID: 21-SMCC-1792, for ST. LOUIS BOA PLACE, LLC.

 [Request Filed](#)

Request for Alias Summons.

Filed By: HELMUT STARR

On Behalf Of: MARY MACAULAY

 [Notice of Service](#)

Return of Service.

Filed By: HELMUT STARR

03/01/2021 [Jury Trial Scheduled](#)

Scheduled For: 08/23/2021; 9:00 AM ; MICHAEL FRANCIS STELZER; City of St. Louis

02/21/2021 [Summons Issued-Circuit](#)

Document ID: 21-SMCC-1225, for JONES LANG LASALLE AMERICAS INC.

 [Summons Issued-Circuit](#)

Document ID: 21-SMCC-1224, for ST. LOUIS BOA PLACE, LLC.

02/18/2021 [Filing Info Sheet eFiling](#)

Filed By: HELMUT STARR

 [Pet Filed in Circuit Ct](#)

Petition for Damages.

Filed By: HELMUT STARR

On Behalf Of: MARY MACAULAY

 **Judge Assigned**

**IN THE CIRCUIT COURT OF THE CITY OF SAINT LOUIS
STATE OF MISSOURI**

MARY MACAULAY,)
Plaintiff,) Cause No.
v.) Division No.
ST. LOUIS BOA PLACE, LLC, a)
Delaware Limited Liability Company,)
Serve:)
Amy L. Brock)
Registered Agent)
800 Market Street)
Suite 301) JURY TRIAL DEMANDED
St. Louis, Missouri 63101,)
and)
JONES LANG LASALLE)
AMERICAS, INC.)
Serve:)
CSC-Lawyers Incorporating)
Service Company)
221 Bolivar Street)
Jefferson City, MO 63101)
Defendants.)

PETITION FOR DAMAGES

COMES NOW Plaintiff, Mary Macaulay, by and through her attorneys of record, Helmut Starr, Keith Cheung and Anastasia Brubaker of Curtis, Heinz, Garrett & O'Keefe PC, and for her causes of action against Defendant St. Louis BOA Plaza, LLC and Defendant Jones Lang LaSalle Americas, Inc., states and avers as follows:

GENERAL ALLEGATIONS

1. At all relevant times herein mentioned, Plaintiff Mary Macaulay was employed

in the City of St. Louis and was a resident of Saint Louis County, Missouri.

2. Defendant St. Louis BOA Plaza, LLC (“BOA Plaza”) is a Delaware limited liability company, duly licensed and registered to do business in the State of Missouri, and is the owner of the building commonly known as Bank of America Plaza, 800 Market Street within the City of St. Louis, MO (the “Property”).

3. Defendant BOA Plaza conducts systematic and routine business in the State of Missouri, including in St. Louis City, and is subject to the general and long arm jurisdiction of the Circuit Court of St. Louis City, State of Missouri.

4. At all relevant times to this action, Defendant Jones Lang LaSalle Americas, Inc. (“JLL”) managed and/or controlled the Property and all of its premises. Defendant JLL was responsible for the management, general maintenance, upkeep, and safety of the Property. Defendant had a duty to inspect the premises for dangerous conditions before invitees and/or members of the public were allowed on the Property.

5. The tortious acts, and the injuries caused, discussed herein occurred in within the City of St. Louis, Missouri, providing this Court with jurisdiction and venue over the matter.

6. At all times relevant herein mentioned, Plaintiff was a guest and invitee of Defendants. Defendant had the expectation of gaining a material benefit from Plaintiff’s visit to the Property. Plaintiff, in turn, was relying on Defendants to prevent an unreasonable risk of harm to her.

7. On or about August 14, 2018, Plaintiff was entering the main entrance to the Property by way of the revolving doors and was tripped immediately upon exiting the revolving doors by a rug that was not lying flat/level on the floor of the entrance and lobby of the building.

8. Plaintiff tripped, fell and seriously injured her right hip, necessitating surgical intervention and a complete hip replacement.

9. Defendants and their agents and employees owed a duty to inspect the premises on a regular basis, note any dangerous conditions thereof, and remedy, barricade or warn guests and/or invitees about such dangerous conditions so that guests or invitees would not be unnecessarily injured.

10. Defendants owed a duty of using reasonable care under the circumstances.

11. Defendants and their employees or agents knew or should or could have known of the existence of the dangerous condition of the entryway, floor and rug.

12. Defendants, their employees and/or agents did not use ordinary or reasonable care to: i) maintain the entryway, floor and rug; ii) warn of the dangerous condition; iii) barricade or mark the dangerous condition; or iv) simply remove or correct the dangerous condition of the entryway, floor and rug.

COUNT I: PREMISES LIABILITY
(As against Defendant BOA Plaza)

13. Plaintiff incorporates paragraphs 1 through 12, above, as though fully set forth herein.

14. At all times herein concerned, Defendant BOA Plaza had actual control and possession of the Property.

15. While exercising ordinary care under the circumstances, Plaintiff was walking into the main entryway of the Property, an area where guests and invitees are known to walk and are invited into the lobby of the building, when she fell due to a rug sticking up further than the surrounding floor and located immediately at the exit of the revolving door entryway into the main lobby of the building. The rug caused Plaintiff to severely injure her right hip.

16. The entryway, floor and rug Plaintiff tripped on constituted a dangerous condition.

17. The dangerous conditions were created by Defendant BOA Plaza and its agents

or employees.

18. Defendant BOA Plaza or its employees or agents did not exercise reasonable or ordinary care to remove, remedy, barricade, mark, or warn of the dangerous condition of the Property.

19. As a result of the dangerous condition, the Property of Defendant BOA Plaza was not reasonably safe.

20. Plaintiff's fall and the injuries and damages sustained by her are the direct and proximate result of the negligence, carelessness, faults and omissions of Defendant BOA Plaza in one, more, or all of the following particulars:

- a. failing to use reasonable or ordinary care to remedy, barricade, guard against, mark or warn about the dangerous condition, when Defendant knew, or in exercise of reasonable or ordinary care, should and have known about the dangerous condition of the Property;
- b. failing to carefully inspect the entryway, floor and rug for dangerous conditions, such as the one presented by the rug at the revolving door sticking up unreasonably and causing a tripping hazard; and,
- c. failing to remedy or warn of the rug sticking up unnaturally from the floor at the exit of the revolving door where invitees normally walk into the lobby of the building, and causing Plaintiff to fall and suffer injuries.

21. Defendant BOA Plaza's negligence, carelessness, faults and omissions, as aforesaid, directly and proximately caused or contributed to cause Plaintiff to sustain bodily injury, pain and suffering to her right hip, necessitating surgical intervention and a complete hip replacement. Due to her injuries, Plaintiff required care and treatment from hospitals,

physicians, and other health care professionals, all at substantial expense. Plaintiff was caused and continues to have pain, suffering, inconvenience, impaired mobility, impaired activities of daily living, the ordinary emotional distress that goes with a serious fall and her resulting injuries, ongoing pain, loss of quality of life and inconvenience.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendant BOA Plaza for damages that are fair and reasonable, for costs incurred herein, and for such other and further damages as the Court deems just and proper under the circumstances.

COUNT II: NEGLIGENCE
(As against Defendant BOA Plaza)

22. Plaintiff incorporates by reference the allegations of paragraphs 1 through 21, above, as though fully set forth herein.

23. The injuries and damages suffered by Plaintiff, as set forth above, were the direct and proximate result of the negligent acts and/or omissions of Defendant BOA Plaza, its agents and employees, and each of them, in one, more or all of the following particulars:

- a. failing to use reasonable or ordinary care to remedy, barricade, guard against, mark or warn about the dangerous condition, when Defendant knew, or in exercise of reasonable or ordinary care, should and have known about the dangerous condition of the Property;
- b. failing to carefully inspect the entryway, floor and rug for dangerous conditions, such as the one presented by the rug at the revolving door sticking up unreasonably and causing a tripping hazard; and,
- c. failing to remedy or warn of the rug sticking up unnaturally from the floor at the exit of the revolving door where invitees normally walk into the lobby of the building, and causing Plaintiff to fall and suffer injuries.

24. Defendant BOA Plaza's negligence, carelessness, faults and omissions, as aforesaid, directly and proximately caused or contributed to cause Plaintiff to sustain bodily injury, pain and suffering to her right hip, necessitating surgical intervention and a complete hip replacement. Due to her injuries, Plaintiff required care and treatment from hospitals, physicians, and other health care professionals, all at substantial expense. Plaintiff was caused and continues to have pain, suffering, inconvenience, impaired mobility, impaired activities of daily living, the ordinary emotional distress that goes with a serious fall and her resulting injuries, ongoing pain, loss of quality of life and inconvenience.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendant BOA Plaza for damages that are fair and reasonable, for costs incurred herein, and for such other and further damages as the Court deems just and proper under the circumstances.

COUNT III: PREMISES LIABILITY
(As against Defendant JLL)

25. Plaintiff incorporates paragraphs 1 through 21, above, as though fully set forth herein.

26. At all times herein concerned, Defendant JLL served as BOA Plaza's building manager and had actual control and possession of the Property.

27. While exercising ordinary care under the circumstances, Plaintiff was walking into the main entryway of the Property, an area where guests and invitees are known to walk and are invited into the lobby of the building, when she fell due to a rug sticking up further than the surrounding floor and located immediately at the exit of the revolving door entryway into the main lobby of the building. The rug caused Plaintiff to severely injure her right hip.

28. The entryway, floor and rug Plaintiff tripped on constituted a dangerous condition.

29. The dangerous conditions were created by Defendant JLL and its agents or

employees.

30. Defendant JLL or its employees or agents did not exercise reasonable or ordinary care to remove, remedy, barricade, mark, or warn of the dangerous condition of the Property.

31. As a result of the dangerous condition, the Property managed by Defendant JLL was not reasonably safe.

32. Plaintiff's fall and the injuries and damages sustained by her are the direct and proximate result of the negligence, carelessness, faults and omissions of Defendant JLL in one, more, or all of the following particulars:

- a. failing to use reasonable or ordinary care to remedy, barricade, guard against, mark or warn about the dangerous condition, when Defendant knew, or in exercise of reasonable or ordinary care, should and have known about the dangerous condition of the Property;
- b. failing to carefully inspect the entryway, floor and rug for dangerous conditions, such as the one presented by the rug at the revolving door sticking up unreasonably and causing a tripping hazard; and,
- c. failing to remedy or warn of the rug sticking up unnaturally from the floor at the exit of the revolving door where invitees normally walk into the lobby of the building, and causing Plaintiff to fall and suffer injuries.

33. Defendant JLL's negligence, carelessness, faults and omissions, as aforesaid, directly and proximately caused or contributed to cause Plaintiff to sustain bodily injury, pain and suffering to her right hip, necessitating surgical intervention and a complete hip replacement. Due to her injuries, Plaintiff required care and treatment from hospitals, physicians, and other health care professionals, all at substantial expense. Plaintiff was caused

and continues to have pain, suffering, inconvenience, impaired mobility, impaired activities of daily living, the ordinary emotional distress that goes with a serious fall and her resulting injuries, ongoing pain, loss of quality of life and inconvenience.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendant JLL for damages that are fair and reasonable, for costs incurred herein, and for such other and further damages as the Court deems just and proper under the circumstances.

COUNT IV: NEGLIGENCE
(As against Defendant JLL)

34. Plaintiff incorporates by reference the allegations of paragraphs 1 through 21, above, as though fully set forth herein.

35. The injuries and damages suffered by Plaintiff, as set forth above, were the direct and proximate result of the negligent acts and/or omissions of Defendant JLL, its agents and employees, and each of them, in one, more or all of the following particulars:

- a. failing to use reasonable or ordinary care to remedy, barricade, guard against, mark or warn about the dangerous condition, when Defendant knew, or in exercise of reasonable or ordinary care, should and have known about the dangerous condition of the Property;
- b. failing to carefully inspect the entryway, floor and rug for dangerous conditions, such as the one presented by the rug at the revolving door sticking up unreasonably and causing a tripping hazard; and,
- c. failing to remedy or warn of the rug sticking up unnaturally from the floor at the exit of the revolving door where invitees normally walk into the lobby of the building, and causing Plaintiff to fall and suffer injuries.

36. Defendant JLL's negligence, carelessness, faults and omissions, as aforesaid,

directly and proximately caused or contributed to cause Plaintiff to sustain bodily injury, pain and suffering to her right hip, necessitating surgical intervention and a complete hip replacement. Due to her injuries, Plaintiff required care and treatment from hospitals, physicians, and other health care professionals, all at substantial expense. Plaintiff was caused and continues to have pain, suffering, inconvenience, impaired mobility, impaired activities of daily living, the ordinary emotional distress that goes with a serious fall and her resulting injuries, ongoing pain, loss of quality of life and inconvenience.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendant JLL for damages that are fair and reasonable, for costs incurred herein, and for such other and further damages as the Court deems just and proper under the circumstances.

ATTORNEY'S LIEN CLAIMED

Respectfully submitted,

CURTIS, HEINZ, GARRETT & O'KEEFE PC

/s/ Helmut Starr
HELMUT STARR #32899
KEITH CHEUNG #40908
Anastasia Brubaker #50618
Attorneys for Plaintiffs
130 South Bemiston Avenue, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 Facsimile
hstarr@chglaw.com

Attorneys for Plaintiff Mary Macaulay



Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361
Plaintiff/Petitioner: MARY MACAULAY	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105
vs. Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: ST. LOUIS BOA PLACE, LLC
Alias: A DELAWARE LIMITED LIABILITY COMPANY

AMY L BROCK, RAGT
800 MARKET STREET SUITE 301
ST. LOUIS, MO 63101

SHERIFF'S FEE PAID



You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

February 21, 2021

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

other: _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on _____ (date).

(Seal)

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361
Plaintiff/Petitioner: MARY MACAULAY	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105
vs.	
Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Other	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: JONES LANG LASALLE AMERICAS INC

Alias:

CSC LAWYERS INC SERVICE
COMPANY 221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF



CITY OF ST LOUIS

COLE COUNTY, MO

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

February 21, 2021

Thomas Haegele

Date

Clerk

Further Information:

Sheriff's or Server's Return

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I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent.

leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

other: _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361
Plaintiff/Petitioner: MARY MACAULAY	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105
vs.	
Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Other	
(Date File Stamp)	

Summons in Civil Case

The State of Missouri to: JONES LANG LASALLE AMERICAS INC

Alias:

CSC LAWYERS INC SERVICE
COMPANY 221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF



CITY OF ST LOUIS

COLE COUNTY, MO

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

February 21, 2021

Thomas Kleggen

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

other: _____

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, If applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361
Plaintiff/Petitioner: MARY MACAULAY	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105
vs. Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: ST. LOUIS BOA PLACE, LLC
Alias: A DELAWARE LIMITED LIABILITY COMPANY

AMY L BROCK, RAGT
800 MARKET STREET SUITE 301
ST. LOUIS, MO 63101

SHERIFF'S FEE PAID



COURT SEAL OF
You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

February 21, 2021

Thomas Koppinger

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

other: _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

Request Alias Summons

**IN THE CIRCUIT COURT OF THE CITY OF SAINT LOUIS
STATE OF MISSOURI**

MARY MACAULAY,)
Plaintiff,) Cause No. 2122-CC00361
v.) Division No. 1
ST. LOUIS BOA PLACE, LLC, et al.) JURY TRIAL DEMANDED
Defendants.)

REQUEST FOR ALIAS SUMMONSES

COMES NOW Plaintiff, by and through her undersigned counsel, and requests Alias Summons to issue to be served upon the following Defendants:

St. Louis BOA Place, LLC
Amy L. Crock, Registered Agent
800 Market Street, Suite 301
St. Louis, Missouri 63101
(St. Louis City Sheriff's fee paid at time of filing Petition)

Jones Lang LaSalle Americas, Inc.
CSC Lawyers Inc. Service Company, Registered Agent
221 Bolivar Street
Jefferson City, MO 65101

Respectfully submitted,

CURTIS, HEINZ, GARRETT & O'KEEFE PC

/s/ Helmut Starr
HELMUT STARR #32899
KEITH CHEUNG #40908
Attorneys for Plaintiffs
130 South Bemiston Avenue, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 Facsimile
hstarr@chglaw.com

Attorneys for Plaintiff Mary Macaulay



Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361
Plaintiff/Petitioner: MARY MACAULAY vs.	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105
Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

ALIAS Summons in Civil Case

The State of Missouri to: ST. LOUIS BOA PLACE, LLC
Alias: A DELAWARE LIMITED LIABILITY COMPANY

AMY L BROCK, RAGT
800 MARKET STREET SUITE 301
ST. LOUIS, MO 63101

SHERIFF'S FEE PAID



COURT SEAL OF
YOU ARE SUMMONED
TO APPEAR BEFORE THIS COURT
AND TO FILE YOUR PLEADING TO THE PETITION
A COPY OF WHICH IS ATTACHED
AND TO SERVE A COPY OF YOUR PLEADING UPON THE ATTORNEY FOR
PLAINTIFF/PETITIONER AT THE ABOVE ADDRESS ALL WITHIN 30 DAYS AFTER RECEIVING THIS SUMMONS
EXCLUSIVE OF THE DAY OF SERVICE
IF YOU FAIL TO FILE YOUR PLEADING, JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE PETITION.

March 17, 2021

Thomas Koeppinger

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

other: _____.

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361
Plaintiff/Petitioner: MARY MACAULAY vs.	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105
Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

ALIAS Summons in Civil Case

The State of Missouri to: JONES LANG LASALLE AMERICAS INC

Alias:

CSC LAWYERS INC SERVICE
COMPANY 221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COLE COUNTY, MO

COURT SEAL OF



CITY OF ST LOUIS

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

March 17, 2021

Thomas Hoyerzinger

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with _____, a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ (title).

other: _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

RECEIVED

MAR 25 2021

COLE COUNTY
SHERIFF'S OFFICE

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361	
Plaintiff/Petitioner: MARY MACAULAY	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105	
Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Pers Injury-Other		(Date File Stamp)

ALIAS Summons in Civil Case

The State of Missouri to: JONES LANG LASALLE AMERICAS INC

Alias:

CSC LAWYERS INC SERVICE
COMPANY 221 BOLIVAR STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF



CITY OF ST LOUIS

COLE COUNTY, MO

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

March 17, 2021

Date

Clerk

Further Information:

 22ND JUDICIAL CIRCUIT
COLE COUNTY, MO
FILED
APR - 7 PM 5:00

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.
I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent.
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: CSC (lawyers) S.C. (name) Designee (title).

other: _____.

Served at 350 E. Kildare (address)
in Cole (County/City of St. Louis), MO, on 03-26-2021 (date) at 8:00 AM (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ <u>10.00</u>
Mileage	\$ _____ (_____ miles @ \$. _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361
Plaintiff/Petitioner: MARY MACAULAY	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105
vs. Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

ALIAS Summons in Civil Case

The State of Missouri to: ST. LOUIS BOA PLACE, LLC
Alias: A DELAWARE LIMITED LIABILITY COMPANY

AMERICAN BART
ST. LOUIS, MO 63101

SHERIFF'S FEE PAID



You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

March 17, 2021

Thomas Kappinger

Date

Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above summons by: (check one)

delivering a copy of the summons and a copy of the petition to the defendant/respondent, *W F 38*
 leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with a person of the defendant's/respondent's family over the age of 15 years who permanently resides with the defendant/respondent.

(for service on a corporation) delivering a copy of the summons and a copy of the complaint to: (name) _____ (title).

other: _____

Served at 800 market St SUITE 301 63101 (address)
 in _____ (County/City of St. Louis), MO, on 3-12-21 (date) at 125p (time).

B. Sabourin
 Printed Name of Sheriff or Server

B. Sabourin 8V3 S/2 Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____

Date

Notary Public

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ _____

Supplemental Surcharge \$ 10.00

Mileage \$ _____ (_____ miles @ \$ _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00361	2021 MAR 31 AM 10:04 (Date File Stamp)
Plaintiff/Petitioner: MARY MACAULAY	Plaintiff's/Petitioner's Attorney/Address HELMUT STARR 130 S. Bemiston SUITE 200 CLAYTON, MO 63105	
Defendant/Respondent: ST. LOUIS BOA PLACE, LLC	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	
Nature of Suit: CC Pers Injury-Other		

ALIAS Summons in Civil Case

The State of Missouri to: ST. LOUIS BOA PLACE, LLC
Alias: A DELAWARE LIMITED LIABILITY COMPANY

AMY L BROCK, RAGT
800 MARKET STREET SUITE 301
ST. LOUIS, MO 63101

SHERIFF'S FEE PAID



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March 17, 2021

Thomas Kleggiger

Date

Clerk

Further Information:

Sheriff's Office

Note to serving officer: Summons should be served on:

I certify that I have served the
 delivering a copy of the summons
 leaving a copy of the summons

15 years who permanently
 (for service on a corporation)

other: _____

Served at _____
in _____

Printed Name of Sheriff
Must be
Subscribed

(Seal)

My comr.

Notary Public

Ross
Has this
Per
Frank
4-18

Frank will check

B&A ✓
Bank of America
Closed

Find out who
has this?
atty calling

Sheriff's Fees, if applicable

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.